

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
 )  
 v. ) CRIMINAL NO. 13-10200-GAO  
 )  
 DZHOKHAR TSARNAEV )

# **GOVERNMENT'S ASSENTED-TO MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO PENDING MOTIONS OF MEDIA OUTLETS**

The United States of America, by and through its undersigned counsel, with the assent of the media outlets that have filed pending motions in this case, respectfully moves for a one-week enlargement of time in which to file a response to those motions. As grounds for this motion, the government states the following.

On March 5, 2015, Boston Globe Media Partners, LLP, publisher of The Boston Globe; Trustees of Boston University, D/B/A WBUR-FM; and Cable News Network, Inc. filed a motion for an order unsealing the witness and exhibit lists filed by the parties.

On March 6, 2015, American Broadcasting Companies, Inc., CBS News, a division of CBS Broadcasting Inc., Cable News Network, Inc., and NBCUniversal Media, LLC, filed a motion for leave to inspect and copy trial exhibits entered into evidence at the close of each trial day.

On March 9, 2015, the government requested, and was granted, until March 13, to respond to the pending motions.

The government hereby requests an additional week -- until March 20, 2015 -- to respond to the pending motions. The media outlets that filed the pending motions

assent to the government's request. The media outlets and the government have been seeking a mutually satisfactory resolution to the pending motions and believe that one can be reached before March 20, 2015.

Respectfully submitted,

**CARMEN M. ORTIZ**  
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**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 13, 2015.

/s/ William Weinreb  
William Weinreb